

DOCUMENTS TO BE PRODUCED BY TRIKEENAN TO ELGIN BUTLER

1. All appraisals of Trikeenan NH or Trikeenan NY assets conducted by or on behalf of Trikeenan NH during 2010 and 2011.
2. Any and all documents relating to a third party commitment to sell or contribute equipment for use in the Trikeenan New York manufacturing operation.
3. All audited, reviewed and management prepared financial statements for Trikeenan NY and Trikeenan NH for years ending 2008 – 2010 and monthly year to date together with any letter from the auditing / reviewing firm.
4. Any documents relating to the condition of the New York manufacturing operation or the equipment in New York.
5. Any documents relating to the cost of upgrading or improving the New York manufacturing operation.
6. All employment agreements, consulting agreements, non-compete agreements, inventions agreements or similar agreements with existing or past officers, directors, employees and consultants of either Trikeenan NY, Trikeenan NH or Trikeenan Holdings.
7. Copies of all pending orders.
8. Detailed sales plans with customer detail supporting the Debtors' cash flow projections as filed in connection with the Debtors' Plan and disclosure statement.
9. Any and all marketing plans developed for or by Trikeenan, including drafts thereof.
10. All documents supporting the claim for unpaid wages of Kristen and Stephen Powers.
11. All documents supporting the claims for unpaid directors' fees.
12. All documents relating to the proposed loan to the Debtors by James Putnam or the James Putnam Trust, including all information provided to Mr. Putnam by the Debtors in connection with the loan.
13. All documents, including correspondence and emails with creditors (other than the approved creditor letter) and customers respecting the Elgin Butler Plan for the Debtors.

14. All documents relating to the Debtors' assertions that the Elgin Butler Plan has not been submitted in good faith.
15. All documents relating to the Debtors' assertion that the Elgin Butler Plan is not feasible.
16. Copies of the 2008 – 2010 corporate tax returns of the Debtors.
17. A copy of the Offering Memorandum with all exhibits provided to the subordinated debenture holders.
18. All correspondence between the Debtors and the debenture holders from January 1, 2010 to the present.